



September 9, 2025

**Via ECF**

Hon. Margo K. Brodie  
Chief Judge of the Eastern District of New York  
225 Cadman Plaza East  
Courtroom 6F  
Brooklyn, NY 11201

Norton Rose Fulbright US LLP  
1301 Avenue of the Americas  
New York, New York 10019-6022  
United States of America

Direct line +1 212 318 3340  
mayling.blanco@nortonrosefulbright.com

Tel +1 212 318 3000  
Fax +1 212 318 3400

Re: *Anisimova v. Village Practice Management Company, LLC d/b/a CityMD*, Case No. 1:24-cv-7615-MKB: Update Regarding Motion to Transfer Litigation from the DNJ to this Court

Dear Judge Brodie:

We are counsel to Defendant Village Practice Management Company, LLC in the above-referenced case. Together with counsel for Plaintiff, the parties write to provide an update pursuant to this Court's order of March 25, 2025 granting the parties' joint motion to stay. See Order of the Court issued March 25, 2025 (the "March 25 Order").

As you are aware, *In re CityMD Privacy Litigation*, 2:24-cv-06972 (D.N.J.), is a consolidated class action involving overlapping facts and allegations to the instant matter. See Dkt. 19. On February 18, 2025, Defendant moved to transfer that case from the District of New Jersey to this Court. Subsequently, the parties to this case jointly requested a stay of proceedings. See Dkt. 22. In the March 25 Order, the Court granted the stay and directed the parties to notify it within seven days of the District of New Jersey's decision on the motion to transfer, and to provide a proposed briefing schedule for Defendant's contemplated motion to dismiss.

On September 2, 2025, the District of New Jersey denied the motion to transfer. In light of this ruling, defendant intends on filing a motion to stay or transfer this case to the District of New Jersey. The parties have conferred and agreed to defer briefing on defendant's contemplated motion to dismiss until after a decision on defendant's motion to stay or transfer this case to the District of New Jersey. The parties have agreed to the below deadlines for defendant's motion to stay or transfer this case:

Filing	Deadline
Defendant's Motion to Stay or Transfer	October 6, 2025
Plaintiff's Opposition	November 5, 2025
Defendant's Reply	November 20, 2025

Norton Rose Fulbright US LLP is a limited liability partnership registered under the laws of Texas.

Norton Rose Fulbright US LLP, Norton Rose Fulbright LLP, Norton Rose Fulbright Australia, Norton Rose Fulbright Canada LLP and Norton Rose Fulbright South Africa Inc are separate legal entities and all of them are members of Norton Rose Fulbright Verein, a Swiss verein. Norton Rose Fulbright Verein helps coordinate the activities of the members but does not itself provide legal services to clients. Details of each entity, with certain regulatory information, are available at [nortonrosefulbright.com](http://nortonrosefulbright.com).

If defendant's motion to stay or transfer is denied, the parties will submit a revised briefing schedule for defendant's motion to dismiss within seven days of the Court's ruling if defendant intends to proceed with its motion.

Respectfully submitted,

/s/ Mayling C. Blanco

Mayling C. Blanco

MCB

CC: All counsel of record via ECF.